

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ex rel. )  
CHRISTINE MARTINO-FLEMING, Relator ) Civil Action No. 15-cv-13065-PBS  
and )  
COMMONWEALTH OF MASSACHUSETTS )  
ex rel. CHRISTINE MARTINO-FLEMING, )  
Relator )  
v. )  
SOUTH BAY MENTAL HEALTH CENTER, )  
INC.; COMMUNITY INTERVENTION )  
SERVICES, INC.; COMMUNITY )  
INTERVENTION SERVICES HOLDINGS, INC.; )  
H.I.G. GROWTH PARTNERS, )  
LLC; H.I.G. CAPITAL, LLC; PETER J. )  
SCANLON; AND KEVIN P. SHEEHAN )

## **PARTIES' REQUEST FOR LIMITED FURTHER STAY OF PROCEEDINGS**

Plaintiffs the Commonwealth of Massachusetts and Relator Christine Martino-Fleming (collectively, “Plaintiffs”) and Defendants<sup>1</sup> H.I.G. Growth Partners, LLC and H.I.G. Capital, LLC (collectively, “H.I.G.”), Peter J. Scanlon, and Kevin Sheehan (collectively, “Defendants”) request that the Court extend the administrative stay in this matter an additional thirty (30) days to September 22, 2021.

As grounds for this request, the parties state that they are working productively to execute a settlement agreement that will resolve this matter. The parties have continued to exchange drafts of the settlement agreement and have only a few final issues remaining to resolve. The parties do not expect these issues to scuttle resolution of the case but need some additional time to address

<sup>1</sup> On January 6, 2021, Defendants South Bay Mental Health Center, Inc, Community Intervention Services, Inc., and Community Intervention Services Holdings, Inc. filed a Notice of Pending Bankruptcy, ECF No. 352, advising the Court of their Chapter 11 petition pending in the United States Bankruptcy Court for the District of Massachusetts. Pursuant to 11 U.S.C. § 362(a), this action is presently stayed as to these Defendants.

them, given the complexity of the matter and the number of parties involved. The United States assents to this request for a limited stay.

Dated: August 13, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Kevin Lownds, hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

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